

CORRES. CONTROL
OUTGOING LTR. NO.

000024708

Rocky Flats Plant
North American Space Operations
Rockwell International Corporation
P.O. Box 464
Golden, Colorado 80402-0464
(303) 966-7000Rockwell
International

Contractor to U.S. Department of Energy

June 26, 1989

89-RF-2190

29 RF 2190

DIST.	LTR	ENCL
SANCHINI, D.J.		
BACER, C.P.		
ERFURDT, R.J.	X	
HEINTZ, E.R.		
HOOD, R.C.		
DEKER, E.H.		
KINZER, J.E.		
KIRBY, W.A.		
MCNETT, J.F.		
MEYERS, G.W.		
ROECKER, J.H.		
S-ANNON, W.M.		
WESTON, W.F.		
WOZNAK, B.D.		
YOUNG, E.R.		

E. S. Goldberg
Acting Area Manager
DOE, RFAO

Attention: C. C. Jierree

MONTHLY MONITORING REPORT - NPDES PERMIT NO. CO-0001333

Enclosed is a letter which is required by the Rocky Flats NPDES Permit program. The EPA has determined that it is no longer necessary to send blank forms when no discharge has occurred. There was no discharge from Pond B-3 (discharge 001) during the month of May, 1989. Attached is the Discharge Monitoring Report (DMR) for the discharge of Pond A-3 (discharge 002) during the month of May, 1989.

There are three issues that have transpired during the recent and on-going Justice Department investigations and in the course of resolution of disputed issues regarding the EPA's proposed NPDES Federal Facilities Compliance Agreement (FFCA). One of the issues raised during the Justice Department investigations involves the flow of seeps from the hillside below the spray irrigation fields into the Woman Creek drainage. Field surveys indicate the seeps originate from ground water probably recharged from spray irrigation activities. This flow may be considered a nonpoint source discharge and therefore does not require a point source discharge permit. The second issue raised during the Justice Department investigation involves additional nonpoint source discharges from the domestic wastewater treatment systems at the (outer) east and west guard posts.

The third issue to be resolved by discussions between DOE and the EPA regards the statement by EPA in the Proposed NPDES Federal Facilities Compliance Agreement (FFCA), Docket Number FFCA-CWA-89-2, paragraph 3, page 2 referencing the chromic acid incident as a violation of the NPDES permit. There are a number of discrepancies between the allegation made by the EPA regarding designation of the chromic acid incident as a violation of the NPDES permit and the authorization to discharge provided by the EPA in the letter from EPA's Max Dodson to

CORRES. CONTROL	X	X
CONTRACT ADMIN.		
9. Dixon	XX	
E. Hobbs	XX	
9. Seiler	XX	
9. Sundblad	XX	
CLASSIFICATION		
UNCLASSIFIED	XX	
CONFIDENTIAL		
SECRET		

AUTH. CLASSIFIER SIG.

Anne Iclavich

6-26-89

DATE

IN REPLY TO LTR. NO.

DEC # 11A DMR

TR APPROVALS

GHS

JRS & TYPIST INITIALS

115

ADMIN RECORD

IA-A-000272

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Albert Whiteman, ref. 8WM-C. For example, the FFCA states that "DOE does not have approval to dispose of chromic acid through outfalls 001, 006, 007, or the Upper Church Ditch." The letter providing approval to discharge Pond B-5 to the Upper Church Ditch, referenced above, sets limits on that discharge for any single sample of 0.05 mg/l total chromium. In addition, there was no discharge through outfall 001 (Pond B-3). The water was spray irrigated during this time period. The water in Pond C-2 (discharge 007) was 24-hour composite sampled during the discharge in April, 1989. The total chromium analyses ranged from <0.01 mg/l to 0.012 mg/l over the six-day discharge period. The pond system is included in the currently approved (by EPA) Spill Prevention, Control, and Countermeasures/ Best Management Practices Plan (SPCC/BMP) as designated spill control holding ponds (page 27 "Holding Ponds"). It is Rockwell's view that the chromic acid that was accidentally released to the environment was held as designated in the SPCC/BMP plan until natural biological treatment in the holding ponds provided for a release to the "Waters of the U. S." that met applicable federal and state water quality standards.

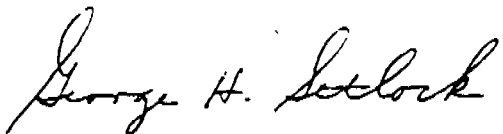
It is necessary that the Principal Executive Officer sign and date the letter and the information be sent to the following people by June 28, 1989.

Mr. Pat Godsil, Chief
Compliance Branch
Water Management Division
U. S. Environmental Protection Agency, Region VIII
One Denver Place
999 - 18th Street, Suite 500
Denver, CO 80202-2413

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Colorado Department of Health
Attention: Stanley V. May
Monitoring and Enforcement Section
Water Quality Division
4210 East Eleventh Avenue
Denver, CO 80220



G. H. Setlock, Manager
Environment and Health Programs

Orig. and 1 cc: E. S. Goldberg
Enc.

DRAFT DRAFT DRAFT

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Denver, CO 80220

This letter constitutes the monthly report as required by Rocky Flats NPDES Permit CO-0001333. There were no violations of the NPDES Permit during May, 1989.

During the month of May water was spray irrigated from Pond B-3. Pond A-3 (Discharge 002) was discharged May 23, 1989 through May 26, 1989. The Reverse Osmosis Pilot Plant (Discharge 003) was not operated. The Reverse Osmosis Plant (Discharge 004) did not discharge to offsite waters. Pond B-5 discharge to the Upper Church Ditch was initiated on April 24, 1989. Total discharge from Pond B-5 to the Upper Church Ditch through May 26, 1989 was 14,765,815 gallons.

The water quality information for the discharge of Pond B-5 to the Upper Church Ditch was submitted to you recently as required.

